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ILLINOIS COMMERCE COMMISSION

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ILLINOIS COMMERCE COMMISSION

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)
CENTRAL ILLINOIS LIGHT COMPANY d/b/a)
AmerenCILCO;)
CENTRAL ILLINOIS PUBLIC SERVICE)
COMPANY d/b/a AmerenCIPS; and)
ILLINOIS POWER COMPANY d/b/a AmerenIP)
(The Ameren Illinois Utilities))
)
)

Docket No. 07-0539

PETITION FOR LEAVE TO INTERVENE

OF THE NATURAL RESOURCES DEFENSE COUNCIL

Pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Adm. Code, Section 200.200, hereby petitions the Illinois Commerce Commission to be permitted to intervene as a party in the proceeding captioned above. In support of its Petition, NRDC states a follows:

1. NRDC is a not-for-profit membership organization, incorporated under the laws of the State of New York and in good standing with the State of Illinois, with over 27,000 members and on-line activists in Illinois, and 1.2 million members and on-line activists nationally.

2. On November 15, 2007, Commonwealth Edison Company ("ComEd") filed with the Illinois Commerce Commission ("ICC") a petition seeking approval of its Energy Efficiency and Demand Response Plan in the above captioned docket.

3. NRDC and its members have a long-standing interest and expertise promoting energy efficiency and other demand-side resources as viable and cost-effective sources of energy, and alternatives to conventional supply-side generation resources such as coal and nuclear power plants.

4. NRDC and its members and activists within ComEd's service territory and within the State of Illinois will be directly and materially affected by the results of this proceeding and the ComEd Energy Efficiency and Demand Response Plan.

5. NRDC has been granted intervention in two cases related to this matter, Docket No. 07 - 0540 and Docket No. 07 - 0541.

6. On December 21, 2007, NRDC filed the Direct Testimony of Henry Henderson in Docket No. 07 - 0541 (NRDC Exhibit 1.0) and attempted to file identical testimony in Docket No. 07 - 0539 (See, Direct Testimony of Henry Henderson in Docket No. 07 - 0530, attached hereto.)

7. On December 21, 2007, The Ameren Illinois Utilities, filed rebuttal testimony in this matter, including the Rebuttal Testimony of Richard A. Voytas (Ameren Exhibit 7.0).

8. Mr. Voytas' testimony responds to the testimony of Henry H. Henderson. See Ameren Exhibit 7.0, pages 27 - 32, lines 543 to 653.

9. NRDC agrees to accept service by electronic means as provided for in Section 200.1050 of the ICC's Rules of Practice (83 Ill. Adm. Code 200.1050).

WHEREFORE, the Natural Resources Defense Council respectfully requests the Illinois Commerce Commission:

- (A) Grant the Natural Resource Defense Council's petition to intervene in the captioned proceeding;
- (B) Enter into the record of this Docket the attached Direct Testimony of Henry H. Henderson as NRDC Exhibit 1.0; and,
- (C) Place on the official service list for receipt of all notices, pleadings, documents, and other materials relevant to this docket:

Henry L. Henderson
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Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Andrew E. Wetzler", written over a horizontal line.

Andrew E. Wetzler

Deputy Director, Midwest Program

Natural Resources Defense Council

544 White Oak Place

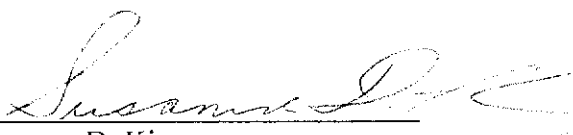
Worthington, OH 43085

Dated: January 4, 2008

CERTIFICATE OF SERVICE

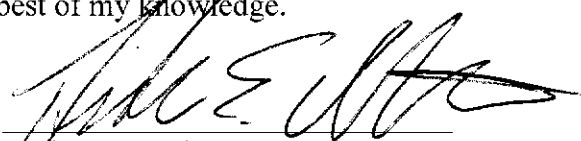
I, Susanne D. King, hereby certify that a copy of the Natural Resources Defense Council's NOTICE OF FILING in the above captioned docket and the document referenced therein was served upon the parties listed in the Service List for this docket, by electronic mail, in accordance with the Rules of Practice of the Illinois Commerce Commission.

Dated: January 3, 2008

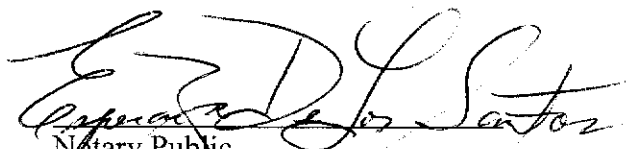

Susanne D. King
Natural Resources Defense Council
101 North Wacker Drive, Suite 609
Chicago, Illinois 60606

VERIFICATION

I, Andrew Wetzler, certify that (i) I am Deputy Director of the Midwest Program of the Natural Resources Defense Council; (ii) I have read the attached Petition for Leave to Intervene for the Natural Resources Defense Council; (iii) I am familiar with the facts stated therein; and (iv) the facts are true and correct to the best of my knowledge.


Andrew Wetzler

SUBSCRIBED and SWORN to before me
this 4th day of January, 2008


Notary Public



NOTICE OF FILING

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS LIGHT COMPANY d/b/a
AmerenCILCO;
CENTRAL ILLINOIS PUBLIC SERVICE
COMPANY d/b/a AmerenCIPS; and
ILLINOIS POWER COMPANY d/b/a AmerenIP
(The Ameren Illinois Utilities)

Docket No. 07-0539

NOTICE OF FILING

TO: Elizabeth Rolando, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62706

All Parties on the
Attached Service List

Please take note that on January 4, 2008, we caused to be filed with the Clerk of the Illinois Commerce Commission, 527 E. Capitol Ave., Springfield, Illinois 62701, a Petition for Leave to Intervene of the Natural Resources Defense Council, a copy of which is attached and hereby served upon you.

Respectfully submitted,

NATURAL RESOURCES DEFENSE COUNCIL

By: 

Andrew Wetzler
Natural Resources Defense Council
544 White Oak Place
Worthington, OH 43805
Phone: (312) 780-7429

Dated: January 4, 2008

NOTICE OF FILING